

June 25 AM

I am continuing my review of the emission calculations and have some comments for you.

1. The HD Tank factors used for the TV renewal were cited as being from NCASI TB 858, Table 11. When looking at NCASI TB 849, these same factors can be found in Table T-28. The factors used in the baseline calculations are being chosen from NCASI TB 849, Table A-12 by selecting a specific source instead the summary factors which had been used in the Title V. The factors used in the baseline are not a consistent starting point using the TV emission factors, as with most of the other baseline calculations. Why?

The Title V renewal includes two different HD pulp storage tanks. The twelve (12) HD pulp storage tanks are true storage tanks and use the TB 858 TRS emission factors. The emissions from the 12 HD pulp storage tanks will not change as a result of Project Columbia.

There is another HD pulp tank in the Kraft pulp mill. This tank is collected in the HVLC System and incinerated along with the other pulp mill sources. The pulp mill HD tank is a “wide-spot” in the process to regulate the pulp flow from the washers to the refiners and functions more like a flow-through process tank. The pulp mill HD tank has an air sweep that potentially results in higher TRS emissions than the twelve (12) HD storage tanks, as suggested in TB 849, Figure 22b. The Title V renewal TRS emission factors for this tank are different to account for the higher vent flow into the HVLC System.

- a. FYI, just in case - Tab “Catawba NCG factors” – baseline TRS as S factor for the HD tank – does this come from Table A-12 from NCASI TB 849? I get 1.207 lb/hr-tank for Unit Code PST1E3. Otherwise, your value is 1.07. Where did this come from?

The TRS as S emission factor has been corrected to 1.207 lb/hr-tank.

2. Please justify using new baseline factors for the Paper Machines and Pulp Dryer PM, PM10, and PM2.5 emissions versus using the ones from the TV renewal. The values used in the TV renewal are 0.0058 lb/ADTFP for all three pollutants.

The baseline factors for the paper machine and pulp dryer were updated to match the more recent NCASI Technical Bulletin 942 factors for the future linerboard production. The linerboard emission factor in TB 884 is 0.0016 lb/ADTFP (Table E1 – source PMCA10). The emission factor for the baseline emissions has been changed to the Title V renewal factor and the projected future emissions have been changed to the corresponding TB 884 emission factor for linerboard (0.0016 lb/ADTFP) for consistency. There are no PM10, PM2.5, or CPM emission factors in TB 884 so the TPM has been assumed to equal PM10 and PM2.5 as in the Title V renewal.